

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION

In re: Antionio Vega Stanley

Case No. 09-11720

Debtor.

Chapter 13

OBJECTION OF YATES MOBILE SERVICES CORPORATION  
TO CONFIRMATION OF DEBTOR'S FINAL PLAN AS PROPOSED ON MARCH 22, 2010

COMES NOW the Claimant, Yates Mobile Services Corporation, trading as Yates Homes Sales ("Yates"), and objects to Debtor's final plan as proposed (the "Plan"), and for its objection states as follows:

1. Yates does not accept the Plan.
2. Yates is the holder of a claim, which is secured by a judgment lien attached to Debtor's real property located in Caswell County, to include without limitation the real property located at 2258 Seamster Road, Providence (Caswell County), NC 27315 (the "Property").
3. Debtor co-owns the property with Sandra King Genevicz, who is a debtor under a separate chapter 13 bankruptcy case that is before the Court, as case number 09-11993.
4. The Debtor and Ms. Genevicz own the Property as co-tenants.
5. Yates has moved for reconsideration of the Court's Memorandum Opinion and Order, entered on March 15, 2010, which partially avoided more than \$100,000.00 of the judgment lien in the Property. A hearing on this motion has been set for April 27, 2010, at 2:00 p.m. If the motion is granted, Debtor's proposed plan will not satisfy the confirmation requirements of Section 1325.
6. Yates has also moved for relief from stay, in this case and in Ms. Genevicz's bankruptcy case, seeking authority to sell the Property under

state law and apply the proceeds toward satisfying the judgment liens against Mr. Stanley and Ms. Genevicz. These hearings are set for April 27, 2010.

WHEREFORE, the Claimant, Yates Mobile Services Corporation, requests the entry of an Order denying confirmation of the Plan, or in the alternative continuing the hearing on confirmation of Mr. Stanley's plan until a determination can be made on Yates's motion for reconsideration of the Court's Order and Memorandum Opinion that partially avoided the judgment lien against Mr. Stanley, and for such further relief as is just.

Dated: April 13, 2010

Respectfully Submitted

YATES MOBILE SERVICES CORP.

By Counsel

Counsel:

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/s/ Darren W. Bentley  
Darren W. Bentley

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of April, 2010, the foregoing objection was filed electronically with the U.S. Bankruptcy Court and was served on the following parties, electronically on those parties who are CM/ECF participants, and by U.S. Postal Service on those parties who are non-CM/ECF participants:

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/s/ Darren W. Bentley  
Darren W. Bentley